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July 3, 2024

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BY ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Reclaim the Records and Alec Ferretti v. United States Department of State, No. 23 Civ. 1529 (VEC)*

Your Honor:

I am a partner at Beldock Levine & Hoffman LLP. Mr. Benjamin Meyers, the author of the Plaintiffs' papers, was just released from Bellevue Hospital on Monday night. On June 24th he went for an examination at Gouverneur Hospital because his shortness of breath was getting worse. They performed tests and determined that Mr. Meyers needed to be in the care of a cardiologist immediately. He was then transferred to Bellevue where he remained for the last week. Mr. Meyers long term prognosis is good, but as he was just released from the Hospital, it is likely to take a couple of weeks for him to be back to full strength.

We respectfully request a 30-day extension of time reply to the Government's opposition to our cross-summary judgment motion. The Government consents to this request. This will allow Mr. Meyers to complete the briefing on this matter, or if he is unable, for another attorney to get up to speed and complete the briefing.

We apologize for the inconvenience this causes to the Court and the parties. Should this request be granted, the plaintiffs' reply would be filed by August 2, 2024. Presently, the reply is due today, July 3, 2024.

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We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, consisting of a large, stylized 'D' followed by a horizontal line and a small upward stroke.

David B. Rankin